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September 14, 2023

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Sun Chemical Corporation v. American Home Assurance Company, et al.
Civil Action No. 2:20-cv-6252 (SRC-CLW)

Dear Judge Waldor:

Pursuant to Your Honor's direction at the September 11, 2023 case management conference, the parties have met and conferred and submit the proposed Sixth Amended Pretrial Scheduling Order. The parties also provide an update concerning Plaintiff's request to file a Third Amended Complaint concerning the four actions Plaintiff's counsel described during the conference as being related to the subject matter of the pending declaratory judgment action. Defendants consent to Plaintiff filing the proposed Third Amended Complaint by Tuesday, September 19, 2023. As such, that has been added to the scheduling order.

We respectfully request that the order be executed by Your Honor.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Martha N. Donovan', with a long horizontal flourish extending to the right.

Martha N. Donovan

MND/pd
Enclosure
cc: All counsel of record via ECF

